

Department	Language in Action	Implementation Date	15 th May 2026
Official name of the policy	Behaviour Policy (v2.0)	Last Reviewed/Update Date	15 th May 2026
Policy Owner	Adam Ennis (Head of Juniors)	Approval Date	15 th May 2026
Policy Approver	Emiliano Sallustri (Managing Director ELT – Designated Safeguarding Lead)	Next Review	15 th May 2027

Behaviour Policy

1. Overview and Aims

Language in Action is committed to the health, safety and well-being – both physical and emotional – of all its community members, students and staff alike. Every student has the right to enjoy their experience and work towards their educational goals without disruption caused by the misconduct of another student.

Language in Action is committed to equal opportunities and non-discrimination in all aspects of its provision, in accordance with the Equality Act 2010.

The parameters of unacceptable behaviour are made clear to the whole student body during the induction process, including health and safety rules (e.g. fire and smoke alarms) and UK laws regarding smoking and alcohol. The expectations of student conduct are also provided in the terms and conditions of the student induction pack and on the Language in Action website.

Language in Action is further committed to:

- Encouraging students and staff to speak out against bullying, with the assurance that each situation will be treated with gravity and integrity
- Following the Group Safeguarding and Prevent Policy and LiA addendum for any student under the age of 18
- Keeping detailed records to identify patterns of behaviour and prevent future incidents
- Fulfilling its legislative obligations under the Human Rights Act 1998 and the Equality Act 2010

2. Definitions and Anti-Bullying Framework

Bullying is defined, in accordance with the Office of Children and Young People's Services' Anti-Bullying Strategy, as a persistent, deliberate attempt to hurt or humiliate someone. Most forms of bullying share three common features: it is deliberately hurtful, it is repeated over time, and there is an imbalance of power that makes it difficult for the target to defend themselves.

Bullying may take the following forms:

- Physical: hitting, kicking, pushing, intimidation or interference with personal property
- Verbal: threats, taunts, name-calling, ostracism or spreading of rumours
- Racist: abuse or ridicule based on race, colour, ethnicity, nationality, culture or language
- Faith or culture-based: negative stereotyping or ridicule based on religion or culture
- Sexist: use of sexist language or negative stereotyping based on gender
- Sexual: unwanted or inappropriate physical contact or sexual innuendo, sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Homophobic: name-calling or negative stereotyping based on sexual orientation
- Disability-related: name-calling, stereotyping or exclusion based on disability or learning difficulties
- Gifted/Talented: ostracism or negative peer pressure based on high levels of ability or effort
- Cyber bullying: online or text-based abuse, interfering with electronic files, or inappropriate sharing of images

Bullying is considered a safeguarding concern and therefore this policy is to be read in conjunction with the Group Safeguarding and Prevent Policy and LiA addendum.

3. Policy Principles

- All students must be clearly informed of expected behaviour in the classroom, during excursions and in all other activities, including what constitutes poor conduct towards teachers, staff and fellow students
- Teachers and operational staff should feel supported by their managers and the organisation when confronted with poor conduct
- Managers must be informed as soon as possible in order to address problems before they escalate, and should act fairly and impartially in their judgement
- Bullying will not be tolerated in any form; all allegations will be thoroughly investigated and sanctions may include suspension or expulsion

4. Student Disciplinary Procedure

Incidents of minor misconduct are addressed by Teachers and operational staff as they occur. More serious or repeated issues are escalated through the following graduated procedure.

Level of Incident	Action to be Taken
1. Minor Misdemeanours Examples include but are not limited to: • Repeatedly talking in mother tongue in class • Rowdy behaviour in the canteen and other campus spaces • Skipping dinner queues • Breaking curfews • Rudeness to staff or contractors (impoliteness) • Not following instructions on trips First offence: Action A. Second offence: Action B.	A. Informal Verbal Warning Used with small or rare student misdemeanours that do not warrant a formal record. Usually given by Teachers or operational staff.
2. Misdemeanours Examples include but are not limited to: • Frequently misbehaving in class • Frequent lateness • Rarely but intentionally disobeying staff instructions • Lesser forms of bullying (e.g. unfriendliness to peers) First offence: Action B. Second offence: Action C.	B. Formal Verbal Warning Verbal warnings recorded as incidents and given by the management team, ideally the Centre Manager or Director of Studies. The warning is logged and the student is reminded that further incidents may lead to more serious disciplinary sanctions.
3. Serious or Continuous Misconduct Examples include but are not limited to: • Continuing to behave in the same manner following a Formal Verbal Warning • More serious forms of bullying (e.g. physical or emotional) • Persistent misbehaviour in class • Underage smoking and alcohol drinking • Small, isolated but intentional damage (e.g. setting off a fire extinguisher) First offence: Action C. Second offence: Action D.	C. Written Warning The Programme Manager must be notified. They will inform the student's agent and request that parents be informed. The Centre Manager arranges a formal meeting with the Group Leader, student and Welfare Officer to issue the Written Warning. The Written Warning may be accompanied by proportionate temporary sanctions, such as exclusion from specific excursions or activities.
4. Misconduct Warranting Expulsion Examples include but are not limited to: • Repeated behaviour after a Written Warning • Serious endangerment of self or others • Continuously and consciously disrupting the programme	D. Expulsion from Programme and/or Centre The HO Co-Lead and the Head of Juniors must be consulted and, through them, the agency and parents informed. Students and Group Leaders should also be made aware of the Complaints Procedure. Expulsion levels include: • Permanent removal from lessons and/or activities

• Behaviour that becomes uncontrollable for centre staff • Drug abuse including so-called legal highs • Constant and intentional disobeying of instructions • Serious and malicious damage to property • Any physical, verbal or sexual abuse of students or staff • Breach of British law	• Permanent removal from the centre
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5. Process for Serious Incidents

It is very rare for a student to be excluded following a single incident. The following steps apply:

- The staff member addresses the behaviour directly with the student, clarifying what is unacceptable, its impact, and the expected standard of conduct going forward
- The staff member informs their line manager, who monitors the situation
- If no improvement is observed, the line manager speaks with the student, hears their account, reassesses the situation and informs Head Office
- If the behaviour continues, the line manager formally warns the student that further action will be taken within a stipulated timeframe
- If poor behaviour persists, expulsion is enacted as a last resort in accordance with the disciplinary procedure

For expulsion to take effect, the HO Co-Lead and the Head of Juniors must be consulted, and through them the agency and parents/guardians must be informed. The student has the right to be accompanied at any formal meeting.

Language in Action will ensure that return travel is suitably organised and that the student is escorted safely to the point of departure. Staff will maintain duty of care from the moment the decision is communicated until the student passes through the departure gate.

6. Staff Guide: Responding to Challenging Student Behaviour

This section provides operational guidance for staff on how to identify, address and escalate challenging student behaviour. It complements the Student Disciplinary Procedure set out above and should be read alongside the Group Safeguarding and Prevent Policy and LiA addendum.

Purpose

To ensure that challenging student behaviour is addressed promptly and consistently, minimising its impact on the staff member, the wider student group and the learning environment.

Principles

- Staff should never manage a challenging situation in isolation; line manager involvement is expected from the outset
- All parties must be treated fairly and impartially; the behaviour of all individuals involved should be considered before action is taken
- Early intervention is always preferable to escalation; staff are expected to act at the first sign of difficulty
- Staff who raise concerns about student conduct should feel fully supported by their managers and by the organisation

Step-by-Step Guidance for Staff

Step 1 – Direct Intervention. At the first instance of poor conduct, the staff member should speak to the student privately where possible. The conversation should cover: which specific behaviour is unacceptable, the impact it is having on others, and clear goals for the expected standard of conduct going forward. The staff member should also notify their line manager of the situation and keep them updated as it develops.

Step 2 – Line Manager Involvement. If the behaviour does not improve following Step 1, the line manager speaks directly with the student to hear their account, reassess the situation and reiterate the behavioural expectations. The line manager also informs Head Office at this stage.

Step 3 – Formal Warning and Timeframe. If poor behaviour continues after Step 2, the line manager formally informs the student that a specific improvement is required within a defined timeframe, and that failure to improve will result in further disciplinary action in accordance with the Student Disciplinary Procedure.

Step 4 – Escalation to Disciplinary Procedure. If no improvement is observed within the agreed timeframe, the matter is escalated in accordance with the disciplinary procedure (see Section 4). Expulsion is enacted only as a last resort, following full consultation with the HO Co-Lead and the Head of Juniors and notification of the agency and parents/guardians.

What Staff Should Document

At every stage, staff should record:

- The date and nature of the incident or concern
- The action taken and by whom
- The student's response
- Any commitments or timeframes agreed

Records must be passed to the Centre Manager and stored securely. In the event of escalation to expulsion, full documentation of all stages is required and will be made available to the student upon request.

Reminders for Staff Working with Under-18 Students

When dealing with challenging behaviour involving students under the age of 18, staff must:

- Ensure a second adult is present during any formal conversation with the student
- Notify the Welfare Officer as early as possible
- Not make contact with parents/guardians directly without prior authorisation from the Centre Manager or Head Office
- Follow the Group Safeguarding and Prevent Policy and LiA addendum if there is any concern for the student's welfare

7. Reporting and Recordkeeping

All issues of problematic behaviour are recorded by the Centre Management staff. In the event of exclusion, all stages leading to that decision – including minutes of formal meetings – must be properly documented. This report will be made available to the student upon request.

For bullying incidents specifically:

- The incident is reported to the Welfare Officer or Centre Manager, who investigates immediately
- If there is a racial element or other grounds for escalation, a Head Office member is informed without delay
- Hard and soft copies of incident records are stored in secure folders
- The Director of Studies, relevant teachers and agency group leaders are informed and encouraged to monitor the situation
- Sanctions against the perpetrator are determined by Centre Management and/or Head Office as appropriate

Record keeping and information storage must be in line with section 10 of the Group Safeguarding and Prevent Policy and LiA addendum. Should any incidents also represent a safeguarding concern, this needs to be recorded on the safeguarding log.

8. Specific Areas of Responsibility

LIA Head Office will:

- Determine and review strategies and procedures
- Ensure that all staff have an opportunity to discuss strategies and review them
- Discuss development of strategies with centre management staff
- Ensure appropriate staff training is available
- Ensure procedures are communicated to all staff, students and parents/guardians
- Review reports on serious incidents and identify improvements

Centre Managers, Campus Coordinators and Welfare Officers will:

- Be responsible for the day-to-day management of the policy and systems
- Ensure that there are positive strategies and procedures in place to help both the bullied and bullies
- Keep the LIA Head Office informed of all incidents
- Arrange relevant staff training
- Determine how best to involve parents/guardians in the solution of individual problems for students under 18
- Report all incidents to Head Office as they arise

All Staff will:

- Be responsible for ensuring that LIA positive strategies are implemented
- Be aware of LIA's policy and procedures with regards to behaviour and bullying
- Deal with any incidents by reporting them to the Centre Management staff
- Never allow any incidents of bullying to pass unreported, whether on-site or during an off-site activity

9. Counselling and Support

Where counselling or additional support is considered appropriate, Language in Action will signpost relevant professional services for both the student affected and, where suitable, the perpetrator. In the first instance, a trained Welfare Officer will speak with the student to determine the appropriate course of action. For serious incidents, the agent and – where the student is under 18 – the parent/guardian will be contacted.

Students should be aware that any information shared with staff regarding illegal activity cannot be held in confidence where there is a potential risk to others.

Bullying of staff members should be reported in the first instance to the relevant line manager, who will in turn inform a member of Head Office.

10. Monitoring and Evaluation

The LIA Head Office will keep and review reports on serious incidents. These will be discussed by the Language in Action / Malvern International management team to assess what can be learned and how procedures can be strengthened over time.

Appendix A: Advice to Students

If you are being bullied:

- Be firm and clear; make eye contact and tell the bully to stop
- Move away from the situation if possible
- Inform a member of staff as soon as possible
- Ask a friend to accompany you if you need support
- Keep speaking up until someone listens
- Do not blame yourself

When reporting an incident, be ready to describe:

- What happened and how often
- Who was involved and who witnessed it
- Where it happened
- What steps you have already taken

After an incident of bullying:

- Tell a member of staff
- Ask a friend to accompany you if you need support in discussing the incident
- Keep speaking up until someone listens
- Do not blame yourself for what has happened

Appendix B: Advice to Staff

Signs that a student may be experiencing bullying:

- A sudden change in behaviour or mood
- Avoiding classes without obvious reason
- Seeming happy outside school but withdrawn on-site
- Unexplained physical injuries

Always report any issue to your line manager who will deal with the situation immediately.

Supporting the affected student:

- Listen and reassure them that they are believed
- Treat their concerns seriously
- Talk through their options and follow up promptly
- If a parent/guardian has been in contact, set a resolution deadline and maintain regular communication
- If the situation cannot be resolved at centre level, refer immediately to Head Office
- Maintain accurate records and continue to monitor the situation

Feedback and Further Information

Language in Action welcomes all constructive feedback on this and any other school policy. For further information or feedback, please contact the Head of Department at adam.ennis@malvernplc.com.